The Highland Council

Agenda Item	**9**
Report No	**AC/26/26**

Committee: **Audit Committee**

Date: **11 November 2026**

Report Title: **Code of Corporate Governance**

Report By: **Chief Officer - Legal and Corporate Governance**

1. Purpose/Executive Summary

1.1 This report provides an update on progress with delivering the Local Code of Corporate Governance for 2025/26 and presents the proposed Code for 2026/27 for Members' approval.

2. Recommendations

2.1 Members are asked to:

i. **Note** the progress on delivering the 2025/26 Code of Corporate Governance; and
ii. **Approve** the 2026/27 Code of Corporate Governance.

3. Implications

3.1 Resource: There are no resource implications arising directly from this report.

3.2 Legal: There are no direct or immediate legal implications arising from this report

3.3 Community (Equality, Poverty, Rural and Island): There are no such implications arising directly from this report.

3.4 Climate Change / Carbon Clever: There are no such implications arising directly from this report.

3.5 Risk: There are no risk implications arising directly from this report. Approving the local Code of Corporate Governance annually is a requirement of good governance which forms an important element of the Council's Annual Governance Statement.

3.6 Health and Safety (risks arising from changes to plant, equipment, process, or people): There are no such implications arising directly from this report.

3.7 Gaelic: No implications are envisaged from this report.

4. **Impacts**

4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.

4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.

4.3 This is an update report and therefore an impact assessment is not required**.**

5. Background

5.1 Local authorities are accountable to the public and other stakeholders for ensuring they have a sound system of governance. They are required to prepare and publish an annual governance statement (AGS) in accordance with statutory regulations.

5.2 The AGS should be consistent with the principles of good governance set out in Delivering Good Governance in Local Government (Governance Framework) which was published in 2016 by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE).

5.3 In May 2025 CIPFA and SOLACE published an addendum to the 2016 Guidance which replaces Chapter 7 of the Framework publication. The 2016 publication and the seven principles of good governance remained unchanged. Authorities were encouraged to ensure AGS from 2025/26 comply with the guidance.

5.4 The 2016 publication identifies the seven principles of good governance each with a number of sub-principles. The seven core principles are:-

A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

B. Ensuring openness and comprehensive stakeholder engagement

C. Defining outcomes in terms of sustainable economic, social and environmental benefits

D. Determining the interventions necessary to optimise the achievement of the intended outcomes

E. Developing the authority's capacity including the capability of its leadership and the individuals within it

F. Managing risks and performance through robust internal control and strong public financial management

G. Implementing good practices in transparency, reporting and audit to deliver effective accountability.

6. Local Code of Corporate Governance

6.1 The Guidance recommends that authorities adopt a local code of governance which sets out governance arrangements showing how governance principles are put into practice. The Guidance identifies that the local code should:-

i) clearly align to the principles in the Framework
ii) take account of the best value statutory guidance or other statutory requirements
iii) be up-to-date and reviewed regularly
iv) identify what arrangements have been put in place to achieve each principle
v) identify values and behaviours as well as processes
vi) include how the Code is reviewed and updated.

6.2 The Local Code of Corporate Governance will form an important element of the AGS which accompanies local authority's annual accounts.

6.3 The Council has adopted the recommendation to have a Local Code of Governance and agreed that the Audit Committee would receive a report annually on the Local Code to ensure proper scrutiny. The Local Code has undergone a number of iterations over the years with a view to removing duplication and creating a more focussed document.

6.4 The Code of Corporate Governance 2025/26 was agreed by this Committee in August 2025 and a copy can be found at **:-**
https://www.highland.gov.uk/download/meetings/id/85444/Item%25209.%2520Code%2520of%2520Corporate%2520Governance%25202025-26

7. Code of Corporate Governance 2026/27

7.1 The Local Code of Corporate Governance 2025/26 has been reviewed and the proposed Code for 2026/27 reflects the further guidance contained in the 2025 Addendum. The proposed Code of Corporate Governance 2026/27 is set out in **Appendix One.**

Designation: Chief Officer - Legal and Corporate Governance

Date: 27 October 2026

Author: Stewart Fraser, Chief Officer - Legal and Corporate Governance

Appendix 1

Principle A - Behaving with Integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law			
Sub Principle: Behaving with Integrity			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
All Councillors have agreed to abide by the Councillors' Code of Conduct, Protocol for relations between Councillors and Employees and the Nolan Principles.	Code of Conduct & Nolan Principles	-	Chief Officer Legal & Corporate Governance
Member Training and Development being developed which will continue to reinforce conduct and integrity as core principles. Programme will consider further training on regulatory issues such as planning, information management and the Code of Conduct. Report to Council on an annual basis on the uptake of Member training and development.	Member Training and Development	Preparation of comprehensive Induction Programme for May 2027 is underway drawing upon Improvement Service materials and guidance. All member training session delivered on licensing in August Workshops, briefings and seminars have been offered on a range of issues and topics	Chief Officer Legal & Corporate Governance
All Officers are required to comply with the Code of Conduct for Officers and Protocol for relations between Councillors and Employees and compliance forms part of the induction for new employees	Code of Conduct for Employees		Chief Officer – HR & Communications
Sub Principle: Demonstrating strong commitment to ethical values			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Council Standing Orders set out the Council's governance arrangements and how decisions are made, and they are reviewed annually	Council Standing Orders		Chief Officer Legal & Corporate Governance
Compliance with the Councillors' Code of Conduct monitored via annual report to Audit Committee	Councillors' Code of Conduct		Chief Officer Legal & Corporate Governance

Code of Conduct for Employees in place and compliance managed through HR policies and procedures including Grievance, Capability and Disciplinary.	Code of Conduct for Employees		Chief Officer – HR & Communications
Financial Regulations and Contract Standing Orders reinforce the ethical values of the Council including in the awarding of contracts to third party organisations.	Financial Regulations and Contract Standing Orders	Mandatory Training Course on Traineasy	Strategic Lead Corporate Audit / Chief Officer Corporate Finance
Sub Principle: Respecting the Rule of the Law			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Statutory Officers are appointed and their responsibilities set out in the Scheme of Delegation. Where appropriate Statutory Officers are part of the Council's Corporate Management Team.	Scheme of Delegation		Chief Executive
Council's Scheme of Delegation sets out the authority delegated to committees and officers and supports compliance with statutory and legislative obligations and is reviewed annually	Scheme of Delegation		Chief Officer Legal & Corporate Governance
The Council's Internal Audit Team undertake investigations into complaints alleging any misconduct or lack of compliance with corporate procedures.	Audit		Strategic Lead Corporate Audit
A Whistle-Blowing Policy is in place and reviewed regularly.	Whistle-Blowing Policy		Strategic Lead Corporate Audit
Financial Regulations and Contract Standing Orders are reviewed regularly to ensure compliance with statutory and legislative obligations	Financial Regulations and Contract Standing Orders		Strategic Lead Corporate Audit / Chief Officer Corporate Finance
HR policies and procedures are in place to deal with Grievance, Capability and Disciplinary matters relating to employees.	HR Policies		Chief Officer – HR & Communications

Principle B - Ensuring openness and comprehensive stakeholder engagement			
Sub Principle: Openness			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Standing Orders for conducting Council business promote openness and transparency with all decisions made in public (unless exemptions under the Act apply) and all agendas and papers published in advance on the Council Website.	Standing Orders		Chief Officer Legal & Corporate Governance
All meetings of the Council, Strategic, Audit and Regulatory Committees are webcast and archived for one year for public access. All committee papers and minutes are published online.	Openness		Assistant Chief Executive Corporate
Continue to develop participatory budgeting across the Council area to encourage community participation in resource allocation. Area Place Plans specifically set out shared community priorities.	Participatory Budgeting	Participatory Resourcing is within the Scheme of Delegation for Area Committees to enable committees to utilise participatory approaches to support and strengthen the involvement of communities in informing service design, delivery, priority setting. Participatory resourcing is now embedded in the Council's newly adopted Participation & Engagement Strategy - 21 May 2026: Communities and Place Committee - Highland Council	Chief Officer Housing and Communities

Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken, including Equality, Gaelic, Rural/Island and Poverty Impact Assessments.	Integrated Impact Assessment	A revised approach to impact assessment was agreed by Council in June 2024 and implemented from July 2024. This includes updated guidance and training for staff and members and a new style of committee report format to support implementation.	Assistant Chief Executives
Sub Principle: Engaging comprehensively with institutional stakeholders			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
The Council is one of five lead partners within the Highland Community Planning Partnership. Work with partners to improve evidencing outcomes and performance reporting in order to deliver improved outcomes for Highland communities.	Highland Outcome Improvement Plan	A revised HOIP was agreed in June 2024 – aligned with individual organisational delivery plans and designed to address the strategic challenges facing Highland. The HOIP is supported by a delivery plan which sets out core partnership actions and delivery mechanisms. The Council considers and scrutinises the Annual Report from the CPP every October, with a six monthly update on progress considered at the Communities and Place Committee. Progress against particular aspects of Highland Outcome Improvement Plan delivery is reported to the relevant strategic committees. Reports on local partnership activity are also considered at Area Committees.	Chief Officer Housing and Communities
The Council engages with the voluntary and community sector through the Community Planning Partnership and the Highland Third Sector Interface as well as directly with community bodies, including Community Councils.	Community Planning Partnership	Third, community and voluntary sector partners are involved in community planning both local – through community Partnerships – and pan-Highland through strategic partnership groups. There has been a broader approach taken to engagement across the Council with a	Chief Officer Housing and Communities

		focus on greater participation of communities in service, design, delivery and priority setting. This takes a range of forms through direct targeted service specific engagement e.g. with tenants groups, children and family providers, through more general community engagement such as budget engagement and development of area place plans. As part of its response to the Poverty and Equality Commission, the Council agreed in September 2026 to develop a third sector strategy and operating framework across the wider partnership, including a commissioning strategy for the third sector between the Council and NHS Highland. The development of the strategy and operating framework will be co-produced, overseen by a third sector reference group. This is fundamentally about changing culture, building trust and relationships and system change in how we work together.	
The Council has strong engagement with the Police Service of Scotland and Scottish Fire & Rescue Service with scrutiny at both a strategic and local level.	Police Service of Scotland and Scottish Fire & Rescue Service engagement.	Police and Fire scrutiny continues through Area Committees and twice a year through the Communities and Place Committee.	Chief Officer Housing and Communities
The Highland Council is the lead organisation for the Inverness and Highland City-Region deal which is being delivered by a local partnership including Highlands and Islands Enterprise, the University of Highlands and Islands and Albyn Housing Society Ltd.	Highland City-Region Deal	Regular monitoring reports are brought to the Economy and Infrastructure Committee Members' Monitoring Group is in place and meets regularly	Assistant Chief Executive Place, Strategic Lead Corporate Audit

Funding is provided through the Scottish and UK governments and is managed by the Council.		Regular Internal audit reviews will be undertaken. The resulting audit reports are available to the governments if required.	
The Highland Council has agreed to act as 'Accountable Body' for the Inverness and Cromarty Firth Green Freeport.	'Accountable Body' for the Inverness and Cromarty Firth Green Freeport	Members' Monitoring Group is in place and meets regularly. The Council appoints one Director to the Inverness and Cromarty Firth Freeport Board. This is currently the Assistant Chief Executive-Place. The Council's S95 Officer, Chief Officer – Corporate Finance, sits as an observer on the ICFGFP Board.	Assistant Chief Executive Place
The Council has a Health & Social Care Partnership with NHS Highland, based on a lead agency model, with NHS responsible for Adult Services and the Council responsible for Children's Service.	Health & Social Care Partnership with NHS Highland	Joint Monitoring Committee made up of representatives from the Council, NHS Highland and the third sector is in place and meets regularly. In December 2024 it was agreed to establish a Steering Group to reconsider the model of our Scheme of Integration, including the option of moving from the existing Lead Agency Model to a body corporate model.	Chief Officer-Integrated People Services/Chief Social Work Officer
The Council has a Staff Partnership Forum in place for engagement with Trade Unions. Trade Unions are also represented on the Council's Redesign Board.	Staff Partnership Forum		Chief Officer – HR & Communications
Sub Principle: Engaging with individual citizens and service users effectively			
Action Description	**Commitment**	**Further Comments**	**Responsible Officer**

As part of the Redesign process, the Council agreed to be more community-minded by listening locally, widening participation in decision-making, supporting community bodies to do more and to target support to particular people and places most in need.	My Council	As part of the My Council programme, the Council has agreed a new Customer Experience Strategy, which has been developed with involvement from the Council's customers. In February 2026, the Council launched a new website that had been developed as part of the My Council programme and Redesign process. This was shaped by direct engagement with customers and key client groups.	Chief Officer Housing and Communities
Community engagement is undertaken on a variety of service and policy issues and led by Service Managers	Community Engagement	In May 2026, a Participation and Engagement Strategy and Action Plan was agreed. Work to date has included: • Procurement and launch of a new on-line engagement platform • Development of a Traineasy package to help staff deliver effective engagement • Engagement calendar developed – forms part of the on-line platform front page • Development of a 'How to Engage' guide for community groups	Assistant Chief Executives / Community Development Managers
The Council engages with specific user groups on a range of issues including our tenants, through the tenant participation network, with parents through our Parent Councils and with young people through the youth work service and the Highland Youth Parliament.	Tenant Participation Network Parent Councils Highland Youth Parliament		Assistant Chief Executives / Chief Officer Housing and Communities

The Council holds a contact database of groups with an interest in equality, diversity and human rights issues and liaises with these groups to share information, engage and seek views on a range of issues.	Equality		Senior Community Development Manager (North and East)
The Council has developed processes to support the aims, objectives and duties contained within the Community Empowerment Act. This supports communities to participate in the allocation of budgets, to be involved in improving service outcomes and to take on buildings or land in order to increase the benefits to the wider community.	Community Empowerment Act		Senior Community Development Managers
The Council supports a network of community councils and engages and consults with them on a regular basis and on a range of issues in order to determine community views and responses from local communities.	Community Council Engagement	The Scheme of Establishment for Community Councils was reviewed and a revised Scheme agreed in September 2025.	Senior Community Development Managers (Mid and West)
Under the Community Empowerment Act the Highland Community Planning Partnership has established 9 local partnerships which are engaging with communities to identify local issues and how outcomes can be improved for the local community, with a specific focus on reducing inequalities.	Highland Community Planning Partnership		Community Development Managers

Principle C - Defining Outcomes in terms of sustainable economic, social and environmental benefits			
Sub Principle: Defining Outcomes			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
The Highland Council Programme for 2022-27 'Our Future Highland' set out goals based on five priorities: A Fair and Caring Highland; Resilient and Sustainable Communities; Accessible and Sustainable Highland Homes; A Sustainable Highland Environment and Global Centre for Renewable Energy; A Resilient and Sustainable Council. The new Council Programme is supported by a performance framework including Performance Plan and Service Plans which set out how performance and delivery will be monitored.	Highland Council Programme	In March 2024 Council agreed a three-year Delivery Plan 2024-2027 which aligns the Budget Strategy for 2024-2027 and the revised Highland Outcome Improvement Plan (HOIP). The Delivery Plan 2024-2027 flows from the Council Programme 2022-2027 and the Performance Plan 2022-2027. It provides a managed approach to implementing the Council's strategic priorities and achievement of financial sustainability through the delivery of medium-term financial planning approach over the next 3 years and beyond with a comprehensive reporting programme in place.	Chief Officer-Revenues and Commercialisation
Redesign projects and initiatives aligned to the Council Delivery Plan	Redesign	Core transformation projects now align to the 6 portfolios within the Delivery Plan. Certain of those projects have been identified for taking forward through the Redesign Board where the direct involvement of Elected Members is key.	Chief Officer-Revenues and Commercialisation
Annual Corporate Performance Report presented to Council to monitor delivery of outcomes and priorities.	Annual Corporate Performance Report		Chief Officer – Business Solutions
Sub Principle: Sustainable economic, social and environmental benefits			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
The Council's Redesign Board is focused on the Council being more open-minded to new ways of delivering services, more community-minded and more commercially-minded to ensure service delivery is sustainable, affordable and aware of community impacts.	Redesign	As referred to above, certain of the key transformational projects within the Delivery Plan are being taken forward through the redesign process.	Chief Officer-Revenues and Commercialisation

The Highland Investment Plan (agreed May 2024 and updated May 2025) incorporates existing capital programme elements, new commitments for roads and infrastructure, as well as future plans for the school, depot, and office estate and for co-location/codelivery with key partners. The plan aims to transform the asset base of Highland Council, such as schools and other premises to centres of community service delivery known as points of delivery (PODs)	Highland Investment Plan		Assistant Chief Executive – Place, Chief Officer Corporate Finance
Corporate Risk Management is undertaken to ensure that the Council identifies and mitigates its key risks, in order to deliver its priorities and outcomes, and reported to Audit Committee.	Risk Management	A revised Corporate Risk Management Policy was approved by the Audit Committee in January 2024. This was supported by a new risk appetite statement which was approved by Council in March 2024.	Strategic Lead - Corporate Audit
Service Risks managed in accordance with the Corporate Risk Management Policy and reported to Strategic Committees	Risk Management		Strategic Lead - Corporate Audit/ Chief Officer Business Solutions
Budget management is the responsibility of budget holders and monitoring reports are presented to Committee quarterly.	Budget Management		Chief Officer Corporate Finance / Assistant Chief Executives
The Council has developed a Medium Term Financial Plan to support the delivery of statutory responsibilities.	Medium Term Financial Strategy	In March 2026 the Council agreed a Medium Term Financial Plan for 2026/27 – 2028/29, the proposed revenue budget and council tax for 2026/27, and indicative revenue budgets for the following two financial years, 2027/28 and 2028/29 including recommendations relating to budget assumptions, pressures and investment, savings, reserves and council tax. The Plan was developed and informed by budget engagement undertaken by the	Chief Officer Corporate Finance

		Council, and with input our communities, citizens, staff and members provided.	

PRINCIPLE D – Determining Interventions necessary to optimise the achievement of the intended outcomes			
Sub Principle: Determining Interventions			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
The Redesign Board's approach includes a core programme of work and targeted lean reviews. These are overseen by the Redesign Board made up of Members and Trade Union representatives.	Redesign		Chief Officer- Revenues and Commercialisation
Options appraisals are undertaken to support significant changes in service delivery and used to inform decision making.	Integrated Impact Assessment Screening		Assistant Chief Executives / Chief Officer Housing and Communities
Financial Approach, agreed by Council, which includes prioritisation of services to manage competing demands within limited financial resources	Financial Approach		Chief Officer Corporate Finance
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken, including Equality Impact Assessments	Guidance for Report Writing Risk. Integrated Impact Assessment		Chief Officer Legal and Corporate Governance
Sub Principle: Planning Interventions			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Performance is reported quarterly to Strategic Committees for scrutiny.	Performance Plan Delivery Plan		Assistant Chief Executives / Chief Officer Business Solutions
Performance management arrangements include quarterly performance reports to Committees for scrutiny. Ongoing performance management/	Performance Management		Chief Officer Business Solutions

monitoring is managed through the Council's Performance & Risk Management System			
The Council is subject to continuous external review on the delivery of Best Value (BV). The Accounts Commission changed their approach to the audit of BV in 2023. This has been fully integrated into the annual external audit work and the outcome is reported in their Annual Audit Report (AAR). In addition an annual BV thematic topic is identified and reported on. A full BV review is still undertaken by the Accounts Commission once over the five-year period. This has been undertaken and they published their report on the Council in April 2025. Their report was considered and the Council's response agreed at Council on 26th June 2025.	Best Value	External Audit reports including any BV findings will be reported to the Audit Committee. Progress on addressing any BV recommendations will also be reported to Council on an annual basis.	Strategic Lead Corporate Audit
The Council has agreed a three-year Delivery Plan 2024-2027 which aligns the Budget Strategy for 2024-2027 and the revised Highland Outcome Improvement Plan (HOIP). The Delivery Plan 2024-2027 flows from the Council Programme 2022- 2027 and the Performance Plan 2022-2027. It will provide a managed approach to implementing the Council's strategic priorities and achievement of financial sustainability through the delivery of medium-term financial planning approach over the next 3 years and beyond.	Delivery Plan	The Council has agreed a comprehensive performance and reporting regimen to support the delivery of the outcomes of the Delivery Plan including annual report to Council, regular reporting to strategic committees and the establishment of officer led Portfolio Boards.	Chief Officer Business Solutions

PRINCIPLE E – Developing the entity's capacity including the capability of its leadership and the individuals within it.			
Sub Principle: Developing the entity's capacity			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Performance against Statutory Performance Indicators and comparison with performance against other Scottish Councils is reported to Council annually.	Performance Management		Chief Officer Business Solutions
Budget monitoring is reported to Committee quarterly and the Annual Accounts are reported to Audit Committee and Council	Budget Monitoring		Chief Officer Corporate Finance
Performance management arrangements include quarterly performance reports to committees for scrutiny and an Annual Performance Report to Council. Ongoing performance management/ monitoring is managed through the Council's Performance and Risk Management System (PRMS)	Performance Management		Chief Officer Business Solutions
Corporate Workforce Planning Strategy was agreed in December 2024 and Corporate Workforce Action Plans developed with bi-annual reporting to the Corporate Resources Committee.	Corporate Workforce Planning Strategy		Chief Officer – HR & Communications
The remit and work plan for the Council's Redesign Board was initially agreed by the Council in June 2017. The Board met in September 2022 to agree an initial portfolio of major strategic projects for consideration and to re-establish a programme of Lean/Rapid Reviews. The redesign process is now aligned with the Delivery Plan, with certain projects being progressed through that route where that will add value. The work of the Council's Redesign Board places staff at the centre of identifying the change that is needed and implementing that change. This includes staff involvement in peer reviews of services, Lean reviews of functions, peer spending	Redesign Board		Chief Officer-Revenues and Commercialisation

reviews and in communicating improvement ideas. The Redesign Board reports directly to the Council.			
A number of significant Partnerships in place which deliver benefits in terms of efficiency and service improvement – for example Health & Social Care Partnership, High Life Highland, Highland City Region Deal and the Inverness and Cromarty Firth Green Freeport.	Partnership Working		Assistant Chief Executives
Sub Principle: Developing the capability of the entity's leadership and other individuals			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Job and Role Descriptions in place for Officers and Senior Elected Members and effective arrangements in place for joint working.	Job and Role Descriptions		Chief Officer HR and Communications/Chief Officer Legal & Corporate Governance
Corporate Health & Well-being Strategy in place supported by an Occupational Health provider and strong trade union engagement through Health & Safety Committees and a network of trade union Health & Safety Representatives.	Corporate Health & Well-being Strategy	Employee Assistance Programme now well established includes free confidential service for all elected members, staff, their partners and dependants over the age of 16. Corporate Occupational Health, Safety, Welfare and Wellbeing Policy reviewed and updated -March 2026	Chief Officer – HR & Communications
The Employee Review & Development (ERD) process ensures that all employees have an annual review of their objectives, performance and support for their training and development needs.	Employee Review & Development	'Traineasy' is used to support the recording of ERDs. ERD templates have been reviewed and updated (2026)	Assistant Chief Executives / Chief Officer HR & Communication
Commitment to Investors in People will support attraction, development, and retention of a skilled and motivated workforce.	IIP Accreditation	Pilot undertaken in the Legal and Corporate Governance function within the Corporate Service Cluster, with roll out across all Services completed in 2026.	Chief Officer – HR & Communications

On-going Member training to support individual and collective capacity and capability.	Member Training	Development of the refreshed training which may include elements of knowledge testing and attendance reporting progressed. The Governance Review Steering Group will inform and direct future Member training needs.	Chief Officer – Legal and Corporate Governance

PRINCIPLE F – Managing the risks and performance through robust internal control and strong public financial management			
Sub Principle: Managing Risk			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Corporate Risk Management is undertaken to ensure that the Council identifies and mitigates its key risks, in order to deliver its priorities and outcomes, and reported to Audit Committee. Risks associated with the Delivery Plan are monitored by Portfolio Boards and reported to Strategic Committees in line with the Portfolio Reporting schedule	Risk Management	Corporate Risk Management Policy incorporating risk Appetite agreed in March 2024	Chief Officer-Business Solutions/ Strategic Lead – Corporate Audit
Project Management Policy in place which identifies the process for effective risk management and the reporting and governance arrangements required.	Risk Management – Project		Chief Officer Business Solutions
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken including Integrated Impact Assessments	Report Writing		Assistant Chief Executives / Chief Officer Legal and Corporate Governance
Sub Principle: Managing Performance			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
The Council has agreed a comprehensive performance and reporting regime to support the delivery of the outcomes of the Delivery Plan	Delivery Plan		Chief Executive / Assistant Chief Executives

including annual report to Council, regular reporting to strategic committees and establishment of officer led Portfolio Boards.			
Audit Committee in place which is chaired by an opposition Councillor provides effective oversight and assurance.	Audit Committee		Strategic Lead – Corporate Audit
Strategic Committee structure in place which supports policy development, effective decision making and scrutiny of delivery and performance. These are supported by sub-committees, Boards and member seminars/briefings where appropriate which will increase Councillor capacity to engage in policy development.	Strategic Committee		Chief Officer Legal & Corporate Governance
Performance management arrangements include quarterly performance reports to Committees for scrutiny and an Annual Performance Report to Council. Ongoing performance management/ monitoring is managed through the Council's Performance & Risk Management System (PRMS).	Performance Management		Chief Executive Chief Officer – Business Solutions
An annual report on the Performance Plan including analysis against targets, benchmarks, family group and national averages.	Performance Plan	In March annually the Council considers a report on Statutory Performance Indicators and the Local Government Benchmarking Framework. This annual approach is being reviewed. In September annually the Council receives an annual performance report centred on delivery of the Performance Plan.	Chief Officer – Business Solutions
Performance against Statutory Performance Indicators and comparison with performance against other Scottish Councils is reported to Council annually.	SPI / LGBF Report	This information reporting on Statutory Performance Indicators and the Local Government Benchmarking Framework has traditionally been reported to Council in March each year.	Chief Executive – Chief Officer – Business Solutions
Sub Principle: Robust Internal Control			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**

Audit Committee receives an Annual Internal Audit Report which provides an audit opinion upon the adequacy and effectiveness of the Council's framework of governance, risk management and control.	Internal Audit	This is reported annually to the May meeting of the Audit Committee.	Strategic Lead Corporate Audit
Sub Principle: Managing Data			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
PSN Accreditation is assessed annually through an external IT security health check to provide assurance about network and infrastructure security in relation to personal and other sensitive data.	PSN Accreditation		Chief Officer Business Solutions
Access to IT systems and data is controlled using a layered approach. Network access is either via Scottish Wide Area Network (SWAN) - a secure public sector network linking all Council sites - or via VPN for remote and home working. Users are authenticated via a cloud authentication service.	Network access via SWAN or VPN		Chief Officer Business Solutions
Information and Data Management Strategy and supporting policies in place, including handling of personal data, and management of records under the governance of the Information Governance Board chaired by the Assistant Chief Executive Corporate. Records Management Plan approved by National Records of Scotland.	Information Management and Data Strategy		Senior Information Risk Owner
Data Sharing Agreements in place with key partners to enable safe and secure sharing of data across other bodies.	Data sharing agreements		Data Protection Officer
Information is handled appropriately and securely. Staff receive appropriate training to handle information. Risks associated with information assets are regularly reviewed.	Information Management	Information management is a mandatory training element for employees.	Data Protection Officer
Artificial Intelligence - the Council's use of AI is ethical, transparent and in compliance with legislation and Scottish public sector standards. It	Artificial Intelligence	Artificial Intelligence Policy, Guidance and Templates agreed March 2026 and will be reviewed regularly	Chief Officer – Business Solutions

should support innovation while safeguarding public trust, privacy and fairness.			
Sub Principle: Strong public financial management			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
The Council has developed a Medium Term Financial Plan to support the delivery of statutory responsibilities.	Medium Term Financial Strategy	In March 2026 the Council agreed a Medium Term Financial Plan for 2026/27 – 2028/29, the proposed revenue budget and council tax for 2026/27, and indicative revenue budgets for the following two financial years, 2027/28 and 2028/29 including recommendations relating to budget assumptions, pressures and investment, savings, reserves and council tax. The Plan was developed and informed by budget engagement undertaken by the Council, and with input our communities, citizens, staff and members provided	Chief Officer Corporate Finance
Budget monitoring is reported to Committee quarterly and the Annual Accounts are reported to Audit Committee and Council.	Budget Monitoring		Chief Officer Corporate Finance

PRINCIPLE G – Implementing good practice in transparency, reporting and audit to delivery effective accountability			
Sub Principle: Implementing good practice in transparency			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**
Guidance for Report Writing reinforces that all reports to Council and Committees must include the risks and implications of any decisions being taken including Integrated Impact Assessments	Integrated Impact Assessments		Chief Officer Legal and Corporate Governance
All Agendas and accompanying reports are published on the Council's Website and all Council, Strategic and Regulatory Meetings are webcast and archived for public access	Openness		Chief Officer Legal and Corporate Governance
Sub Principle: Implementing good practice in reporting			
Action Description	**Commitment**	***Further Comments***	**Responsible Officer**

Annual and Quarterly reporting on Performance and Budget Monitoring, to Council and Strategic Committees	Performance and Budget Monitoring		Chief Officer Corporate Finance / Chief Officer – Business Solutions
The draft Annual Governance Statement is reviewed by the Audit Committee. The final Annual Governance Statement is published as part of Annual Accounts and reported to Council and Audit Committee	Annual Governance Statement		Chief Officer Corporate Finance/ Strategic Lead Corporate Audit/ Chief Officer Legal and Corporate Governance
Local Code of Corporate Governance reviewed annually and reported to Audit Committee	Code of Corporate Governance		Chief Officer Legal and Corporate Governance
Sub Principle: Assurance and effective accountability			
Action Description	**Commitment**	**Further Comments**	**Responsible Officer**
Internal Audit Plan agreed annually and all audits are reported to Audit Committee, also tracking of actions arising from reports is monitored by the Committee.	Internal Audit		Strategic Lead Corporate Audit
Internal Audit Service in place which reports directly to the Audit Committee. Internal Audit Service must comply with Global Internal Audit Standards (GIAS) in the UK Public Sector	Internal Audit	Conformance on compliance with the GIAS is confirmed within the Internal Audit Annual report provided to the Audit Committee.	Strategic Lead Corporate Audit
National and Performance Audits issued by Audit Scotland are reported to Council, Audit or relevant Strategic Committee to ensure that the Council takes any learning points and actions necessary.	Audit	Reports submitted to Council, Audit or Strategic Committee as appropriate.	Chief Executives / Assistant Chief Executives / Strategic Lead Corporate Audit
Scrutiny of key partnerships undertaken at Council and Strategic Committees and annual reports of ALEO's made to appropriate Committee	Scrutiny of ALEOs		Assistant Chief Executives